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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 UNITED STATES OF AMERICA,) Case No. SACV12-930-DOC (MLGx)
14 Plaintiff,)
15 vs.) Stipulation for Order to Extend Time
16 NAGESH SHETTY, et al.,) for Defendant David M. Dudley to
Defendants.) Respond to Initial Complaint by an
Additional 30 Days; [Proposed] Order
lodged concurrently herewith
17) Complaint Served: 08/09/2012
18) Resp. Currently Due: 10/13/2012
19) New Resp. Due: 11/12/2012

20 Plaintiff United States of America and defendant DAVID M. DUDLEY
21 stipulate as follows:

22 1. On June 11, 2012, plaintiff filed its COMPLAINT (1) TO REDUCE
23 JOINT FEDERAL TAX ASSESSMENTS TO JUDGMENT; (2) FOR A
24 DETERMINATION THAT REAL PROPERTY IS TITLED TO RICHARD
25 D'SOUZA AS NOMINEE OR IN RESULTING TRUST FOR THE BENEFIT OF
26 NAGESH SHETTY AND ANITA SHETTY; (3) TO SET ASIDE FRAUDULENT
27 TRANSFER OF REAL PROPERTY FROM NAGESH SHETTY AND ANITA
28

1 SHETTY TO RICHARD D'SOUZA; and (4) TO FORECLOSE FEDERAL TAX
2 LIENS ON REAL PROPERTIES (hereinafter "complaint").

3 2. On August 9, 2012, copies of the complaint and summons were
4 served upon defendant DAVID M. DUDLEY.

5 3. By way of a second stipulation extending time to answer by 14 days,
6 pursuant to Local Rule 8-3, the last date for defendant DAVID M. DUDLEY to
7 file his answer was extended to October 13, 2012.

8 4. The United States, David M. Dudley, and other lienholder defendants
9 who have appeared in this action are currently working towards a stipulation with
10 respect to lien priority.

11 5. The undersigned parties agree that defendant DAVID M. DUDLEY
12 may have until November 12, 2012, in order to prepare, file, and serve a response
13 to the complaint and respectfully request the Court enter the proposed order lodged
14 concurrently herewith.

IT IS SO STIPULATED.

Respectfully submitted,

ANDRÉ BIROTTE JR., United States Attorney
SANDRA R. BROWN, Assistant U.S. Attorney
Chief, Tax Division

DATE: 10/12/2012

DANIEL LAYTON
Assistant United States Attorney
Attorneys for the United States of America

DATE: October 12, 2012

s/David M. Dudley

DAVID M. DUDLEY, Esq.
Defendant